## REMARKS

The above amendments and following remarks are submitted in response to the official action of the Examiner mailed October 14, 2005. Having addressed all objections and grounds of rejection claims 1-20, being all the pending claims, are now deemed in condition for allowance. Entry of these amendment and reconsideration to that end is respectfully requested.

Claims 1-4, 6-8, 11-14, and 16-18 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,275,939, issued to Garrison (hereinafter referred to as "Garrison:) in view of the article entitled "Access Control in Federated Systems" by De Capitani di Vimercati et al (hereinafter referred to as "De Capitani di Vimercati") and further in view of U.S. Patent No. 6,282,175, issued to Steele et al (hereinafter referred to as "Steele"). In response thereto, Applicants have amended all pending claims to specifically require a "hidden field" containing a "constant" to indicate that the identifier is a site specific identifier. Support for these amendments are found throughout the specification and drawings, with particularly detailed disclosure given in Fig. 14, along with accompanying discussion in the specification. This ground of rejection is respectfully traversed as to the amended claims from the reasons provided below.

In previous responses, Applicants have presented substantial evidence and arguments regarding the failure of the Examiner to meet his burden under MPEP 2143 to establish a *prima facie* case of obviousness. In response thereto, the Examiner has provided three new positions associated with the motivation to combine Garrison with De Capitani di Vimercati. The first of these simply alleges that the references are in the same field of endeavor. The Examiner is well aware of that this is inadequate to meet the requirements of MPEP 2143.

In his second position, the Examiner states:

> .....whereby the user identifier need not be transmitted on a publicly accessible digital communication network (i.e. global authentication), since (sic) **the alternative would be to impose local authentication**..... (emphasis added)

This statement is absolutely inconsistent with Garrison, which teaches encryption of the identifier at column 3, lines 3-8. Therefore, the Examiner's statement is deemed clearly erroneous.

In his final argument, the Examiner states:

> ....since (sic) without such a mechanism all objects would necessarily have the same level of access....

Again, this statement is clearly erroneous on its face. Garrison is only one of the references within the present record which provide multiple "levels" of access without the "mechanism" of De Capitani di Vimercati for changing access levels.

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As a result, the Examiner has again failed to show motivation as based upon legally irrelevant and clearly erroneous findings of fact.

The Examiner similarly fails in his attempt to show the motivation for the further combination of Steele. He states in part:

> ....since (sic) upon receipt of the service request the request can be satisfied merely by executing the corresponding predefined command language script (see Steele et al, col. 7, lines 35-56), without the necessity to first translate the request into a valid SQL command and then submit the SQL command to the database (as is the case in Garrison, col. 8, lines 8-19).

It is absolutely baffling why the Examiner would consider this to show motivation. There is no allegation that the approach of Steele is superior. The Examiner again has failed to show motivation.

The record contains the Examiner's finding of reasonable likelihood of success which provides in part:

> As stated in the previous Office action, in the field of computer programming, **success is assured** in the incorporation of a feature into a piece of software. (Emphasis added)

This statement is clearly erroneous, because it does not account for differences in hardware, software, and system architectures. Most simply, when one purchases a software package, the labeling typically lists "system requirements". In other words, that software package cannot be run on a given system unless it

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comports with those "system requirements". For more complex

"real time" applications, differences in hardware, software, and

system architectures become critical.

It seems most convenient to address the requirement of MPEP

2143 to show all claim elements within the alleged combination by

direct referral to each of the claims.

Specifically, amended claim 1 now requires:

> a second user identifier <u>having a hidden field
> containing a constant indicative of a site specific
> identifier</u>

Clearly, the alleged combination does not have these further

limitations. Therefore, the rejection of amended claim 1, and

all claims depending therefrom, is respectfully traversed for

failure of the Examiner to present a *prima facie* case of

obviousness as required by MPEP 2143.

Claim 6 is an independent apparatus claim. Applicants have

herewith amended it to contain:

> first identifier <u>having a hidden field containing a
> constant indicative of a site specific identifier</u>

The alleged combination does not meet this limitation as declared

above. Therefore, the rejection of amended claim 6, and all

claims depending therefrom, is respectfully traversed for failure

of the Examiner to make a *prima facie* case of obviousness as

specified by MPEP 2143.

Claim 11 is an independent method claim having seven steps

as amended. The added limitation amends the "honoring" step to

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require "a hidden field" indicating that the identifier is a site specific identifier. This limitation is not found in the alleged combination. In fact, as previously argued, the alleged combination does not have this step. Therefore, the rejection of amended claim 11, and all claims depending therefrom, is respectfully traversed for failure of the Examiner to make a *prima facie* case of obviousness as specified by MPEP 2143.

Claim 16 is an independent apparatus claim having means-plus-function limitations. Claim 16 has been amended to add the further limitation that the site identifier contain a "hidden field" which shows that the identifier is a site specific identifier. As explained above, this element is not found in the alleged combination. Therefore, the rejection of amended claim 16, and all claims depending therefrom, is respectfully traversed for failure of the Examiner to make a *prima facie* case of obviousness as specified by MPEP 2143.

In his rejection of claims 2 and 13, the Examiner states:

> Regarding claim 2, **De Capitani di Vimercati et al** additionally teaches a data processing environment **wherein a security profile is generated by said data management system**. (Emphasis added)

This finding is clearly erroneous. However, more important is that the statement is legally irrelevant, because it does not address the claimed invention. "Said data [base] management system" has been found by the Examiner to be present in Garrison as to claims 1 and 11 from which claims 2 and 13 depend. The

claim requires that it is the claimed "data base management system" which also generates the security profile. For the Examiner to find some other "data [base] management system" which is not the claimed element from claims 1 and 11 which may also generate a "security profile" is legally irrelevant. The rejection of claims 2 and 13 and any claim depending therefrom is respectfully traversed as based upon clearly erroneous findings of fact and failure to comply with MPEP 2143.

Claims 3, 8, 12, and 18 require a particular service request to include the claimed site-specific user-id. As amended, claims 3, 8, 12, and 18 require that the claimed site-specific user-id contain the claimed "hidden field" containing the constant. None of the prior art references taken individually or in combination has the claimed site-specific identifier. The rejection of claims 2, 8, 12, and 18 is respectfully traversed as based upon clearly erroneous findings of fact.

Claims 4, 14, and 17 depend from claims 3, 13, and 16, respectfully, and further limit the publicly accessible digital data communication network. As such they each present new and unique combinations not found in the prior art of record. The rejection of claims 4, 14, and 17 is respectfully traversed.

Claim 7 depends from claim 6 and is further limited by "wherein said terminal accesses said data base by transferring said service request to said data base management system". The

Examiner cites Garrison column 6, line 60, through column 7, lines 32, and column 7, line 50, through column 8, line 37. None of these citations even mentions a "service request". Though the term, "service request", has standard usage in the art, a working definition is provided by Applicants at page 25, lines 11-16, as:

> The service request itself is utilized by Cool ICE service handler 156 to retrieve a previously stored sequence of data base management system command statements from repository 166. Thus, in the general case, a single service request will result in the execution of a number of ordered data base management system commands. The exact sequence of these commands is defined by the service request developer as explained in more detail below.

The alleged combination simply does not have this claimed element. The rejection of claim 7 is respectfully traversed as based upon clearly erroneous findings of fact.

Claims 5, 9, 10, 15, 19, and 20 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Garrison in view of De Capitani di Vimercati in view of Steele and further in view of "UNISYS CSG MarketPlace - The Mapper System" (hereinafter referred to as "UNISYS"). This ground of rejection is respectfully traversed for failure of the Examiner to present a *prima facie* case of obviousness as required by MPEP 2143.

None of Garrison, De Capitani di Vimercati, nor Steele mentions a "data base management system". Therefore, it makes no sense to allege that one of skill in the art would be motivated to combine the teachings of UNISYS to provide a particular data
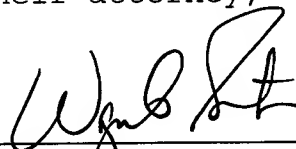
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base management system.  Lacking motivation, it is extremely apparent that there is no reasonable likelihood of success of the alleged combination without the teachings of Applicants.  The rejection of claims 5, 9, 10, 15, 19, and 20 is respectfully traversed for failure of the Examiner to make a *prima facie* case of obviousness.

Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-20, being the only pending claims.

Please charge any deficiencies or credit any overpayment to Deposit Account No. 14-0620.|

Respectfully submitted,

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By their attorney,

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